

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

JEFFREY D. SPRINGMAN, et al.)	CASE NO. 4:17-cv-02544
)	
Plaintiffs,)	JUDGE PEARSON
)	
v.)	
)	MOTION FOR SANCTIONS REQUEST
PRIME LOGISTICS, et al.,)	
)	
Defendants.)	
)	

FILED
MAR - 1 2018
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
YOUNGSTOWN

Your Honor, we respectfully request due to Rule 12 civil procedure violations, we seek to invoke Rule 11 sanctions be placed upon Counsel. We request personal sanctions against Peter Munger and Marshall A. Kupresanin in the amount of \$70,000.00 per day of lost revenue plus the addition of \$17,500.00 at 25% interest for a total of \$87,500.00 per day from his personal finances not payable by his clients. We seek to invoke these sanctions each day, as this matter is needlessly continued, due to the fact that his clients have been found in default. Your Honor, the opposing Counsel continues to purposefully delay this case with frivolous motions. We the Plaintiffs ask these sanctions be granted. We further request that the Preattachment Order be amended to include opposing Counsel as they continue to violate Rule 12 of the Federal Civil Procedures. Thank you, Your Honor, for taking the time to read this motion.

Respectfully submitted,
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